

ORIGINAL

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, DC 20554

MAR 17 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

Reorganization of Parts 1, 2, 21 and 94 of )  
the Rules to Establish a New Part 101 )  
Governing Terrestrial Microwave Fixed )  
Radio Services )

WT Docket No. 94-148

DOCKET FILE COPY ORIGINAL

To: The Commission

**REPLY COMMENTS**

AirTouch Communications, Inc. ("AirTouch"), by its attorneys, hereby submits these Reply Comments in support of certain proposals made by the National Spectrum Managers Association ("NSMA") and the Fixed, Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA") in their Joint Comments filed February 17, 1995 in the above-captioned proceeding.

AirTouch agrees with NSMA/TIA that the Commission should adopt rules that ensure equal treatment for common carrier and private carrier fixed, point-to-point microwave applicants and licensees.<sup>1</sup> In particular, AirTouch endorses NSMA/TIA's assertion that common carrier licensees, like private operational-fixed licensees, must be eligible for pre-authorization

<sup>1</sup> See NSMA/TIA Comments at 7.

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construction under Part 101.<sup>2</sup> However, as discussed in detail in AirTouch's Comments in this proceeding, rules allowing only common carrier pre-authorization construction do not go far enough. AirTouch urges the Commission to adopt rules allowing operation pursuant to blanket authority for the reasons discussed in its Comments.<sup>3</sup>

AirTouch also agrees with NSMA/TIA that certain user-related rules should be revised. In particular, AirTouch supports the transition period proposed by NSMA/TIA to ensure that all affected parties have adequate time to comply with the new Part 101 rules.<sup>4</sup> AirTouch also supports the adoption of a uniform 18 month construction period for all fixed, point-to-point microwave licensees.<sup>5</sup>

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<sup>2</sup> Id. at 16.

<sup>3</sup> AirTouch Comments at 8-10. Numerous Commenters (both common carrier and private carrier) requested that the Commission permit microwave station operation pursuant to blanket authority. See Comments of Local Area Telecommunications, Inc. at 4-6; SBC Communications, Inc. at 5-6; BellSouth at 1-4; Central and South West Services, Inc. at 7-8; Metropolitan Water District of Southern California at 11-12; Entergy Services, Inc. at 10-11; Omaha Public Power District at 1; The Southern Company at 12-13. Similarly, Cellular Communications of Puerto Rico, Inc. recommended that the Commission modify its definition of "temporary fixed station" to permit the operation of microwave stations on an expedited basis prior to license grant. Comments of Cellular Communications of Puerto Rico, Inc. at 7-9.

<sup>4</sup> NSMA/TIA Comments at 32-33.

<sup>5</sup> See id. at 33.

Adoption of the proposals discussed above will further the Commission's efforts in this proceeding to bring uniformity and efficiency to the microwave industry.

Respectfully submitted,

AIRTOUCH COMMUNICATIONS, INC.

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Dated: March 17, 1995

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WT Docket No. 94-187

To: The Commission

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